

EXHIBIT B

DONOVAN & YEE ▲ LLP

The Soho Building ▲ 110 Greene Street, Suite 700 ▲ New York, NY 10012
Telephone: 212-226-7700 ▲ Fax: 212-226-1995
E-mail: aopp@yeellp.com

Writer's Direct Dial:
(212) 226-4271

September 19, 2007

VIA FACSIMILE (212) 226-5085

Robert L. Powley
Powley & Gibson, P.C.
304 Hudson Street, 2nd Floor
New York, NY 10013

RE: 1638/Anna Sui v. Forever 21, Inc. et. al.

Dear Mr. Powley:

We are writing to inform you of a newly discovered Forever 21 garment that infringes on our client, Anna Sui Corp.'s, copyrighted designs. On September 11, 2007, we discovered item number 42420499012 (the "Infringing Product") in Forever 21's recently opened Soho store (see attached). The Infringing Product copies Anna Sui's copyrighted Shadow Leaf Border and Tea Party Border, both of which are already at issue in the current litigation between the parties and are attached exhibits to the First Amended Complaint (See Exhibits 8 and 12).

On behalf of our client, we demand that Forever 21 hereby cease all sales of the Infringing Product and arrange an immediate recall of the infringing merchandise from its sales floor within five (5) business days of your receipt of this correspondence. We also demand that Forever 21 provide us with the following information with regard to the Infringing Product:

1. The identity of the source for the Infringing Product if Forever 21 is not the source;
2. The price and total number of units of the Infringing Product that Forever 21 has purchased;
3. The price and total number of units of the Infringing Product that Forever 21 has sold; and
4. The total number of the Infringing Product that remains in Forever 21's inventory.

Robert Powley, Esq.
Page 2

We must hear from you, in writing, within five (5) days of receipt of this letter acknowledging that all commercial activities with regard to the Infringing Product have been stopped. In the absence of such assurances, we will be compelled to recommend to our client that it take all appropriate steps to protect its rights.

The demands made herein shall not waive or prejudice any rights or remedies which our client may have in respect of the subject matter hereof, all of which rights and remedies are hereby expressly reserved. We look forward to hearing from you and thank you in advance for your cooperation.

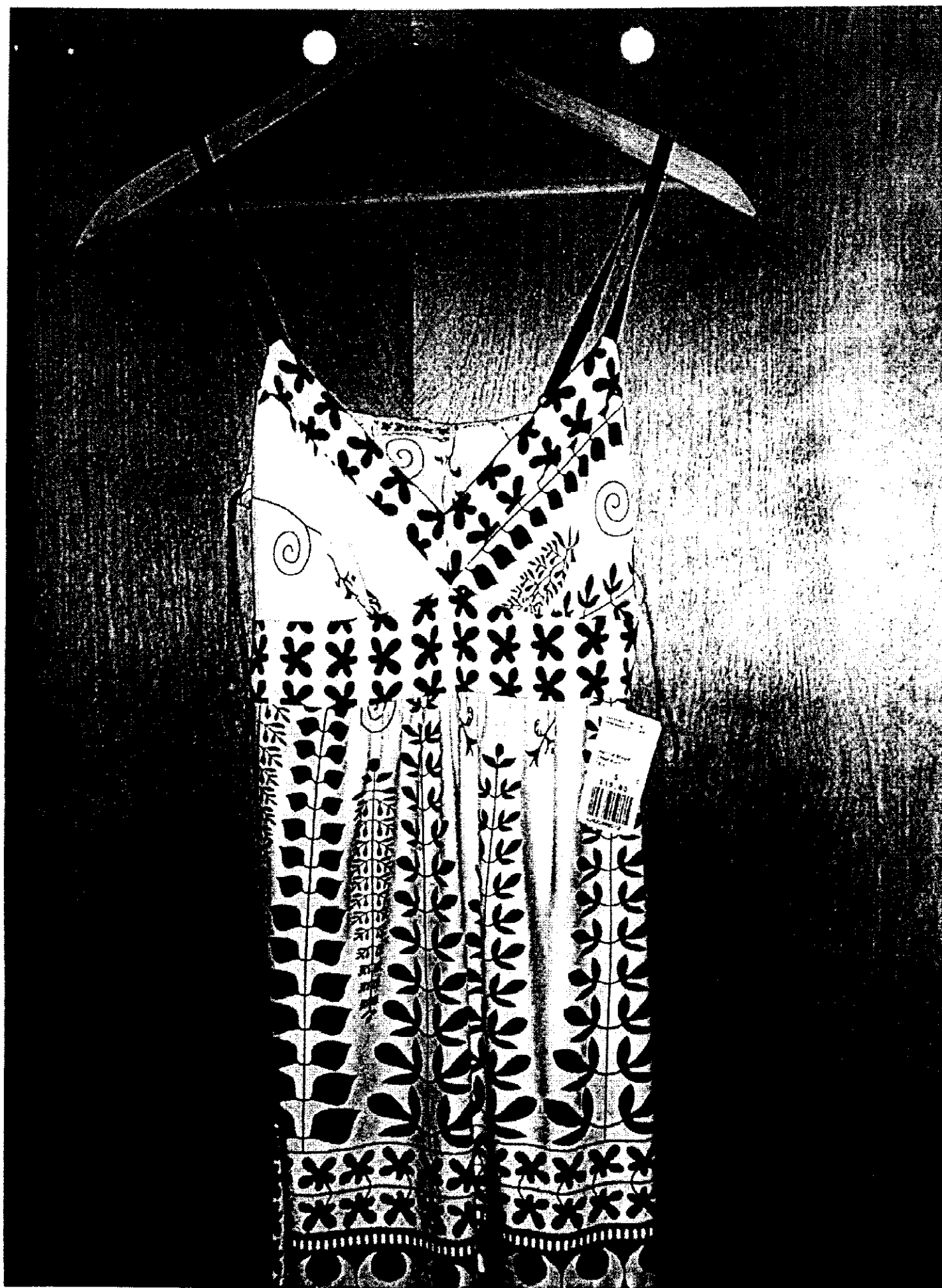
Sincerely,

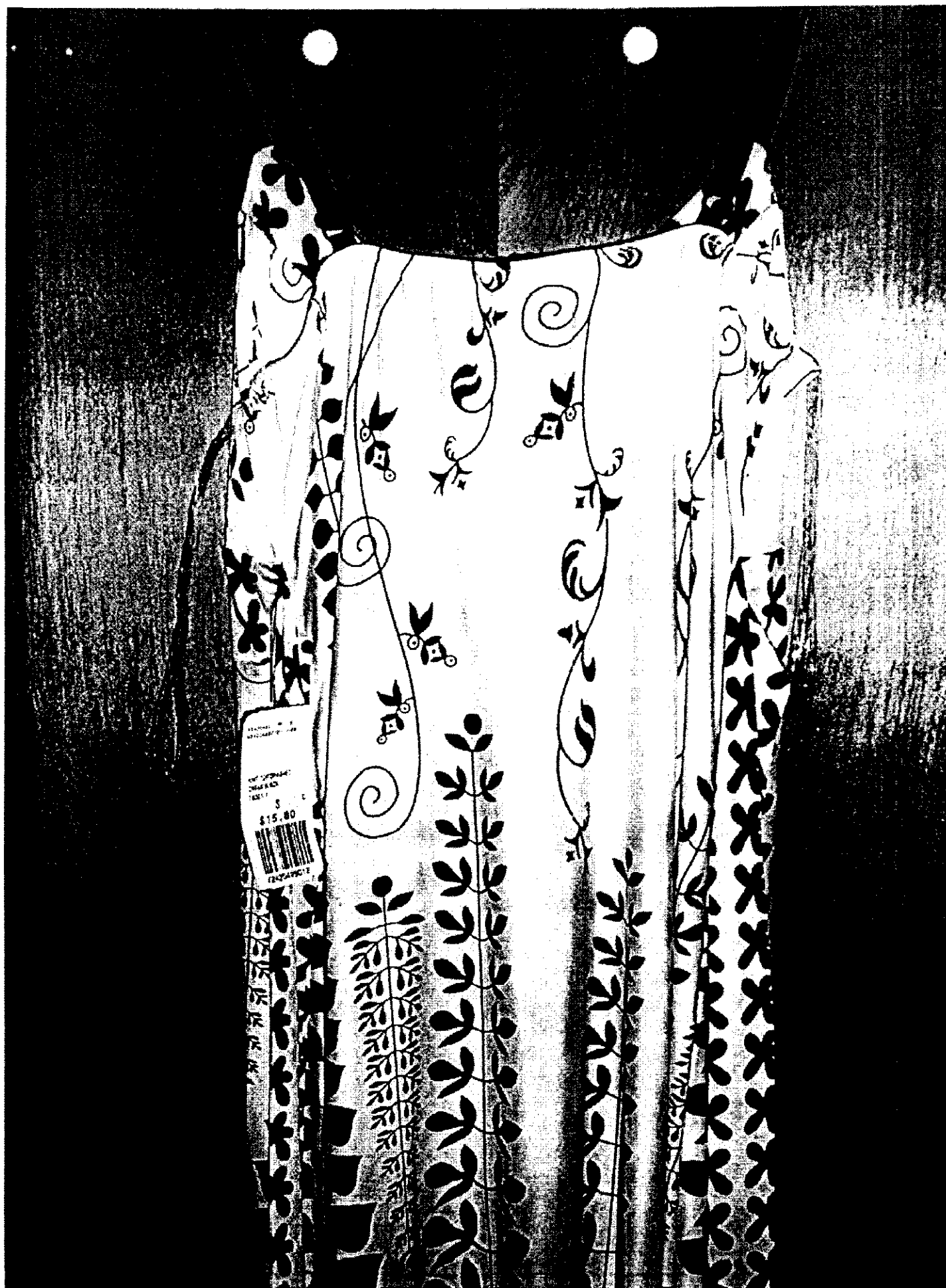

Amy C. Opp

Cc: Marya Lenn Yee, Esq.
Anna Sui Corp.









FOREVER21

Broadway Soho
 578 Broadway
 New York, NY 10012
 212-951-5949

Receipt# : 0271-03-10003673
 Tran Date: 09/11/07 11:06 AM
 Printed : 09/11/07 11:06 AM
 Cashier : Belinda 271020

42420499012 KNIT TOP/KNIT TOP/SPAGHETTI/N
 CREAM/BLACK 1 15.80 T
 41383726011 ACCESSORIES/HANDBAGS/LARGE ST
 BLACK 1 19.80 T2

Sub Total 35.60
 4.375% Tax 0.87
 Total 36.47

Tenders: 1. VISA 36.47
 XXXXXXXXXXXXX4470
 Change: 0.00

ITEMS PURCHASED: 2

EXCHANGE BY DATE: 10/02/07

Exchange or store credit is allowed within 21 days of purchase with original receipt and tags attached. Merchandise must be unwashed, unworn and undamaged for exchange or store credit. Sale merchandise, jewelry and undersarments are all FINAL sale items and cannot be returned for exchange or store credit. Store credit and gift cards are not redeemable for cash or transferable and cannot be replaced if lost or stolen. There are NO cash refunds or credit back to credit/debit cards.

Thank you for shopping at Forever XXI.



*** TX REPORT ***

TRANSMISSION OK

TX/RX NO	4857
CONNECTION TEL	12122265085ppp1638
SUBADDRESS	
CONNECTION ID	
ST. TIME	09/19 17:02
USAGE T	03'14
PGS. SENT	8
RESULT	OK

DONOVAN & YEE ▲ LLP

The Soho Building ▲ 110 Greene Street, Suite 700 ▲ New York, NY 10012
Telephone: 212-226-7700 ▲ Fax: 212-226-1995
E-mail: aopp@yeellp.com

FAX COVER SHEET

Date: September 19, 2007

From: Amy C. Opp

Sender's Direct Dial: (212) 226-4271

Client/Matter: 1638/F21

No. of pages:

To: Robert Powley, Esq.

Company: Powley & Gibson, P.C.

City/Country: New York, NY

Fax Number: (212) 226-5085

Recipient's Tel:

MESSAGE:

Please see attached letter.

POWLEY|GIBSON

VIA FACSIMILE AND FIRST-CLASS MAIL

September 24, 2007

RECEIVED
SEP 26 2007
DONOVAN & YEE LLP

Amy C. Opp
Donavan & Yee, LLP
The Soho Building
110 Greene Street, Suite 700
New York, NY 10012

Re: *Anna Sui Corp. v. Forever 21, Inc. et al.*
Our Reference No.: 329.1

Dear Ms. Opp:

Powley & Gibson, P.C.
304 Hudson Street
2nd Floor
New York, NY 10013
212.226.5054
F 212.226.5085
powleygibson.com

We have reviewed your September 19, 2007 letter and have forwarded a copy to our client. Our client is diligently looking into the facts concerning the subject matter of your letter and will provide us with further information as soon as it is available.

We will make every effort to respond to you within five (5) business days of receipt of your letter. Any information disclosed in response to your September 19th letter is solely for the purpose of reaching settlement, shall not constitute an admission of any liability and shall not waive or prejudice any rights or remedies which our client may have in respect of the subject matter hereof, all of which rights and remedies are hereby expressly reserved.

Sincerely,


David J. Lorenz

Amy Opp

From: Amy Opp
Sent: Tuesday, October 16, 2007 6:11 PM
To: 'rlpowley@powleygibson.com'; 'jmgibson@powleygibson.com'
Cc: Marya Yee
Subject: Anna Sui Corp. v. Forever 21, Inc. et. al.

Dear Bob and Jim:

I wanted to follow-up with you on a few outstanding house-keeping issues, some of which I spoke with David Lorenz about last week. I've broken them down by subject matter below:

Recent Forever 21 Infringements

In letters dated September 19 and October 5 I identified three additional Forever 21 garments (in Forever 21 stores as of October 5) which infringe upon Anna Sui's copyrighted designs already at issue in the current litigation. I have followed-up several times with you to confirm that Forever 21 has recalled these goods from its stores and website, but have yet to receive a response. Please immediately confirm that these goods have been pulled and provide us with the information requested in my letters.

Gadzooks/ Gerald Szczepanski

It is our understanding that Mr. Kwon was going to provide you with details concerning Forever 21's current relationship to Gadzooks, Inc. and Mr. Szczepanski. Please advise us of such status as soon as possible.

Forever 21 Discovery Demands

We have reviewed your document demands and many of the documents you seek contain confidential and proprietary business information, which our client will not produce absent a confidentiality agreement between the parties. We're open to any suggestions you may have regarding a confidentiality agreement and ask that you provide us with a draft agreement.

If you have any questions about the foregoing, please feel free to give me a call. Thanks.

Amy

PS- Bob, my dad graduated from W&L and every fall growing up we spent a long weekend in Lexington- I'm sure it's gorgeous down there right now!

Amy C. Opp
Donovan & Yee LLP
110 Greene Street, Suite 700
New York, N.Y. 10012

Phone: (212) 226 4271
Fax: (212) 226 1995
E-Mail: aopp@yeellp.com

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12/7/2007

Amy Opp

From: James M. Gibson [jmgibson@powleygibson.com]
Sent: Wednesday, October 17, 2007 2:20 PM
To: Amy Opp
Cc: Marya Yee; Robert L. Powley
Subject: FW: F21 Style Numbers
Attachments: Recalled Goods List 6-21-07.doc

Amy,

This really doesn't help us out that much with matching up item numbers to exhibits, so we will respond to your question in your email of yesterday regarding the items identified in your September 19th and October 5th letters as soon as we can.

Thank you,

Jim

POWLEY & GIBSON, p.c.
304 Hudson Street
2nd Floor
New York, New York 10013
p (212) 226 - 5054
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www.powleygibson.com

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Powley & Gibson, P.C., 304 Hudson Street, 2nd Floor, New York, New York 10013.

-----Original Message-----

From: Amy Opp [mailto:AOpp@yeellp.com]
Sent: Wednesday, October 17, 2007 1:53 PM
To: James M. Gibson
Cc: Marya Yee
Subject: F21 Style Numbers

Dear Jim:

Pursuant to our conversation earlier today, attached is Emily Li's email to us concerning what style numbers have been recalled from Forever 21's stores. We are still in the process of organizing our order of proof and do not currently have a document identifying which style numbers correspond to each exhibit, however we have provided a lot of that information to Forever 21 throughout our correspondence and conversations with Mr. Kwon and Ms. Li. Accordingly, they should have the information you are seeking in their files. Thanks.

Amy

12/4/2007

DONOVAN & YEE ▲ LLP

The Soho Building ▲ 110 Greene Street, Suite 700 ▲ New York, NY 10012

Telephone: 212-226-7700 ▲ Fax: 212-226-1995

E-mail: aopp@yellp.com

Writer's Direct Dial:

(212) 226-4271

October 25, 2007

VIA HAND DELIVERY

James M. Gibson
Powley & Gibson, P.C.
304 Hudson Street, 2nd Floor
New York, NY 10013

RE: 1638/Anna Sui v. Forever 21, Inc. et. al.

Dear Jim:

Enclosed please find plaintiff Anna Sui's First Set of Interrogatories and Requests for Admission, First Request for the Production of Documents and Things and Notices of Deposition for Do Won Chang, Jin Sook Chang and a Rule 30(b)(6) witness from Forever 21. We have noticed the depositions at the firm Lewis, Brisbois, Bisgaard & Smith in Los Angeles, but if your clients prefer to be deposed in New York, we are amenable to conducting the depositions here.

Finally, we still have not received a response from you or your client with respect to our September 19, 2007 and October 5, 2007 letters. Please immediately confirm that the Infringing Products identified in the letters have been removed from Forever 21's stores and website and provide the information requested in the letters. Thank you.

Sincerely,


Amy C. Opp

Amy Opp

From: David J. Lorenz [djlorenz@powleygibson.com]
Sent: Thursday, October 25, 2007 4:30 PM
To: Amy Opp
Cc: Robert L. Powley; James M. Gibson
Subject: Anna Sui v. Forever 21 – ORN. 329.1

Dear Amy,

In response to your October 25, 2007 letter, we note that, with no admission of liability or waiver of any of our clients' rights and solely for the purposes of promoting settlement in this litigation, Forever 21 issued instructions to recall the item identified in your September 19, 2007 letter and remove the item from Forever 21's website at the beginning of this month.

Regarding the Forever 21 items discussed in your October 5, 2007 letter, we will advise you as to the status of those items shortly.

Finally, our client has been unable to identify the items cited in Exhibits 11B (top, skirt, green top, blue dress and red dress), 12B (tank top), 15B (black spaghetti strap top), 18B (black spaghetti strap top), 20B (long sleeve top), 21, 23A and 24A to the Amended Complaint solely from the photographs in the Exhibits. As such, Forever 21 has not been able recall those items. Accordingly, we ask again that you please provide item numbers for the items shown in those Exhibits to assist Forever 21 in identifying the items. We note that the list of recalled items previously provided to you by Emily Li does not include the items shown in the above Exhibits.

If you have any questions, please let us know.

Sincerely,
Dave Lorenz

POWLEY & GIBSON, p.c.
304 Hudson Street, 2nd Floor
New York, New York 10013
p (212) 226 - 5054
f (212) 226 - 5085
www.powleygibson.com

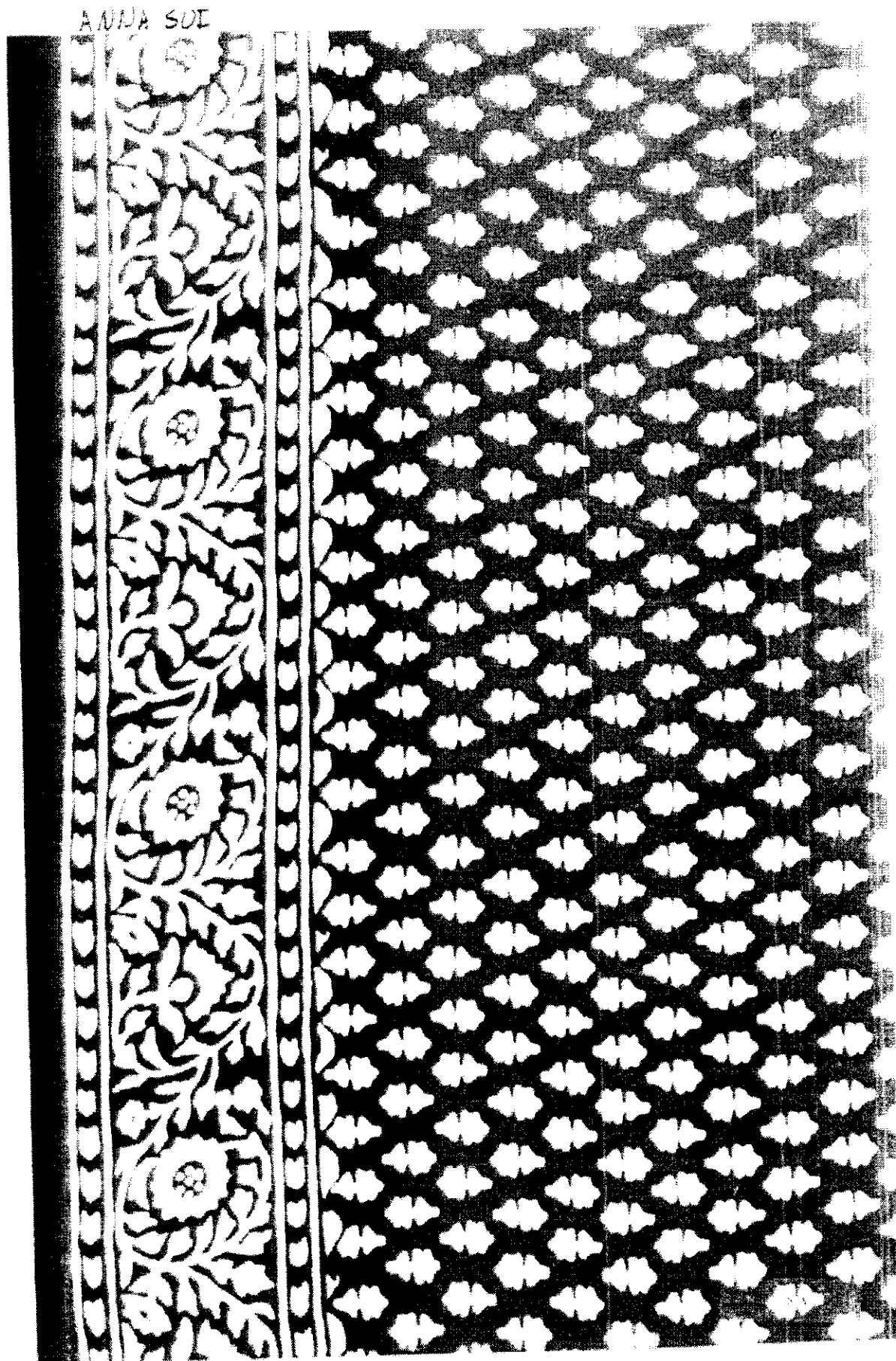
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Powley & Gibson, P.C., 304 Hudson Street, 2nd Floor, New York, New York 10013.

12/4/2007

EXHIBIT C





DC 23 2007 16:47 FAX

Certificate of Registration



This certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters
 Register of Copyrights, United States of America



Form VA
 For a Work of the Visual Arts
 Under Section 105 of the Copyright Act of 1976

VA 1-402-680



EFFECTIVE DATE OF REGISTRATION

March 3 1 07

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

Title of This Work: **WALLPAPER TOWARD BORDER**

NATURE OF THIS WORK: **FABRIC DESIGN**

Division or Administrative Title: **W**

Publication in a Copyrightable Form: If this work has been published in a periodical, book, or collection, give the name of the publisher and the title of the collection. If not published, give the title of the work.

Published in a periodical or book: **Yes** **No** **Serial** **Year** **Page**

2

ANNA SUI CORP

DATE OF BIRTH AND DEATH

Year Born: **1917** Year Died: **1980**

What is the nature of the work? **Original work of author**

Author's Nationality: **U.S.A.**

Was This Author's Contribution to the Work?

Original: **Yes** **No** If the answer is "no," give the name of the person who made the contribution.

Translation: **Yes** **No** If the answer is "no," give the name of the person who made the translation.

Nature of Authorship: Check appropriate box(es). See instructions.

☐ Solely by author

☐ Joint authorship

☐ Photograph

☐ Drawing

☐ Literary work

☐ Musical work

☐ Sculpture

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

☐ Other

Name of Author: **W**

Date of Birth and Death

Year Born: **1917** Year Died: **1980**

What is the nature of the work? **Original work of author**

Author's Nationality: **U.S.A.**

Was This Author's Contribution to the Work?

Original: **Yes** **No** If the answer is "no," give the name of the person who made the contribution.

Translation: **Yes** **No** If the answer is "no," give the name of the person who made the translation.

Nature of Authorship: Check appropriate box(es). See instructions.

☐ Solely by author

☐ Joint authorship

☐ Photograph

☐ Drawing

☐ Literary work

☐ Musical work

☐ Sculpture

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

☐ Other

3

2006

13

SEPTEMBER

13

2006

4

ANNA SUI CORP

250 WEST 39TH STREET

NEW YORK, NY 10018

APPROPRIATE FOR DEPOSIT

ON SEPTEMBER 13, 2006

AT THE COPYRIGHT OFFICE

TWO DEPOSITS RECEIVED

FILED RECEIVED

DO NOT WRITE HERE

Page 1 of 2

IRC

05/01/2007 THU 16:49 177 BY NO ANNE 2006

EXHIBIT D





EXHIBIT E

DONOVAN & YEE ▲ LLP

The Soho Building ▲ 110 Greene Street, Suite 700 ▲ New York, NY 10012
Telephone: 212-226-7700 ▲ Fax: 212-226-1995
E-mail: aopp@yeellp.com

Writer's Direct Dial:
(212) 226-4271

October 5, 2007

VIA FACSIMILE (212) 226-5085

Robert L. Powley
Powley & Gibson, P.C.
304 Hudson Street, 2nd Floor
New York, NY 10013

RE: 1638/Anna Sui v. Forever 21, Inc. et. al.

Dear Mr. Powley:

We are writing to inform you of two more newly discovered Forever 21 garments that infringe on our client, Anna Sui Corp.'s, copyrighted designs. On October 4, 2007, we discovered item numbers 2043053244 (the "Fleur De Lis Babydoll") and 2040135264 (the "Woven Floral Halter") (collectively "Infringing Products") offered for sale on Forever 21's website and in its stores (see Exhibit A). The Infringing Products copy Anna Sui's copyrighted Wallpaper Foulard Border and Cabbage Roses Bandana, both of which are already at issue in the current litigation between the parties and are attached exhibits to the First Amended Complaint (See Exhibits 18 and 19).

On behalf of our client, we demand that Forever 21 hereby cease all sales of the Infringing Products and arrange an immediate recall of the infringing merchandise from its sales floor within five (5) business days of your receipt of this correspondence. We also demand that Forever 21 provide us with the following information with regard to the Infringing Products:

1. The identity of the source for the Infringing Products if Forever 21 is not the source;
2. The price and total number of units of the Infringing Products that Forever 21 has purchased;
3. The price and total number of units of the Infringing Products that Forever 21 has sold; and
4. The total number of the Infringing Products that remains in Forever 21's inventory.

Robert Powley, Esq.
Page 2

We must hear from you, in writing, within five (5) days of receipt of this letter acknowledging that all commercial activities with regard to the Infringing Products have been stopped. In the absence of such assurances, we will be compelled to recommend to our client that it take all appropriate steps to protect its rights.

Finally, we still have not received a response from you or your client with respect to our September 19, 2007 letter. Please immediately confirm that the Infringing Product (42420499012) identified in the letter has been removed from Forever 21's stores and website and provide us with the additional information requested in the September 19 letter.

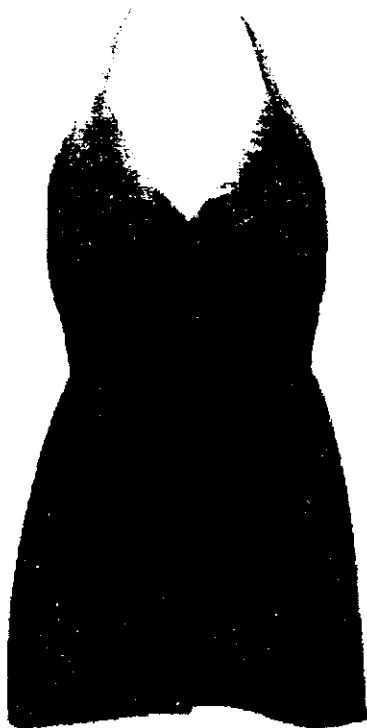
The demands made herein shall not waive or prejudice any rights or remedies which our client may have in respect of the subject matter hereof, all of which rights and remedies are hereby expressly reserved. We look forward to hearing from you and thank you in advance for your cooperation.

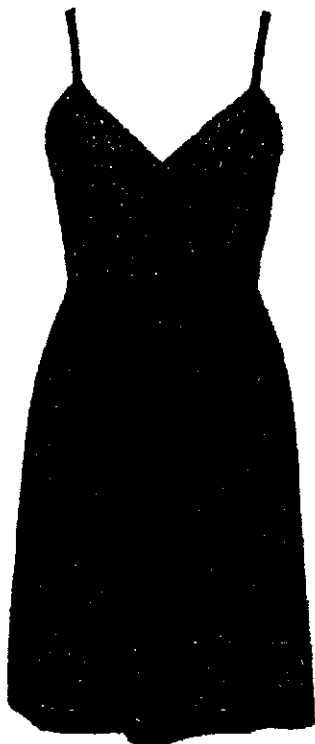
Sincerely,

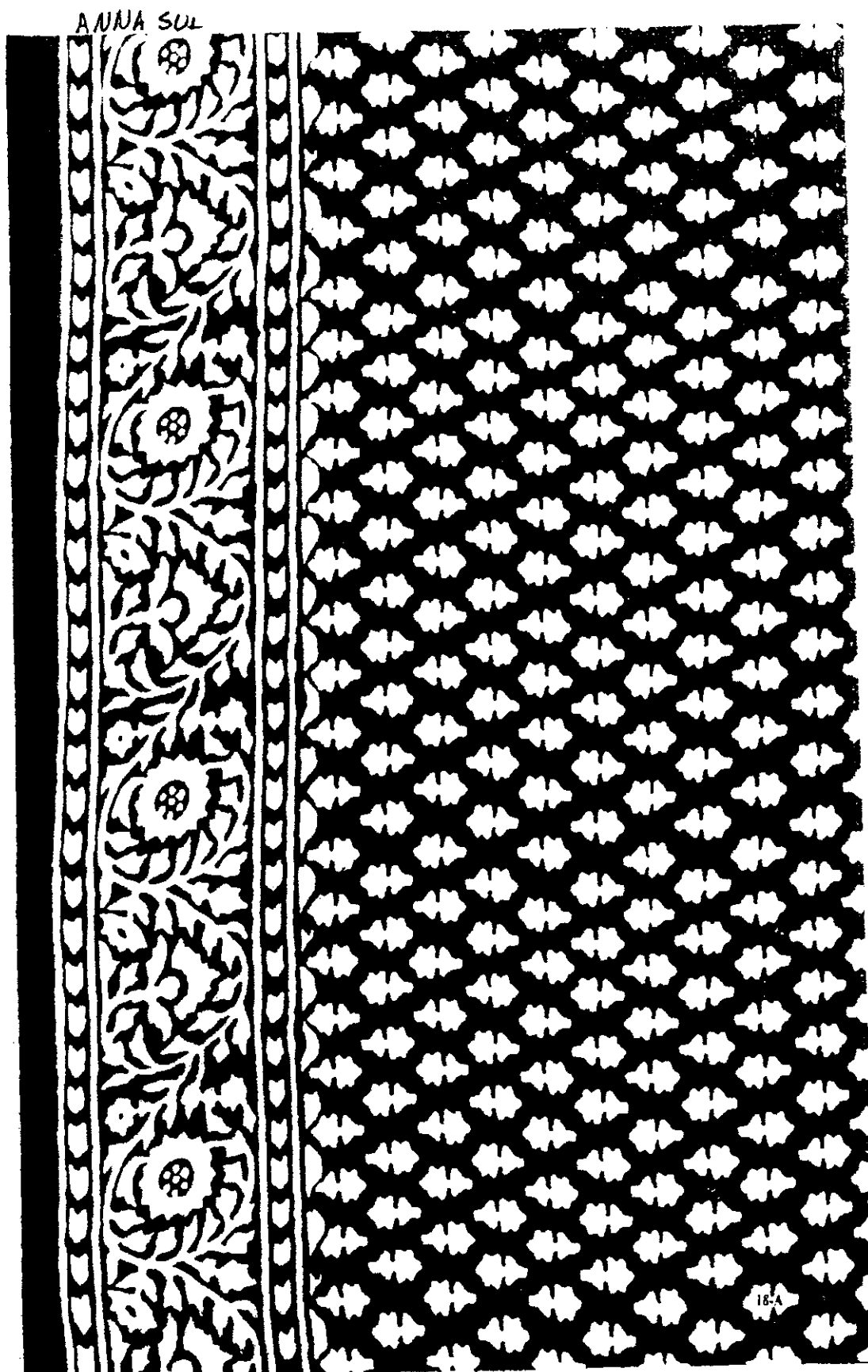

Amy C. Opp

Cc: Marya Lenn Yee, Esq.
Anna Sui Corp.

EXHIBIT A









10/05/2007 16:05 FAX 2122261995

DONOVAN & YEE

001

*** TX REPORT ***

TRANSMISSION OK

TX/RX NO	4886
CONNECTION TEL	12122265085ppp0231
SUBADDRESS	
CONNECTION ID	
ST. TIME	10/05 16:04
USAGE T	01'16
PGS. SENT	8
RESULT	OK

DONOVAN & YEE ▲ LLP

The Soho Building ▲ 110 Greene Street, Suite 700 ▲ New York, NY 10012

Telephone: 212-226-7700 ▲ Fax: 212-226-1995

E-mail: sopp@yeellp.com

FAX COVER SHEET

Date: September 19, 2007

From: Amy C. Opp

Sender's Direct Dial: (212) 226-4271

Client/Matter: 1638/F21

No. of pages: 8

To: Robert Powley, Esq.

Company: Powley & Gibson, P.C.

City/Country: New York, NY

Fax Number: (212) 226-5085

Recipient's Tel:

MESSAGE:

Please see attached letter.

Amy Opp

From: James M. Gibson [jmgibson@powleygibson.com]
Sent: Saturday, October 27, 2007 12:59 PM
To: Amy Opp
Cc: David J. Lorenz; Robert L. Powley
Subject: FW: Anna Sui v. Forever 21 -- ORN. 329.1

Amy,

Further to our email below, Forever 21 has confirmed that it has issued instructions to remove the two items identified in your October 5, 2007 letter from its stores and from its website.

Thank you,

Jim

POWLEY & GIBSON, p.c.
304 Hudson Street
2nd Floor
New York, New York 10013
p (212) 226 - 5054
f (212) 226 - 5085
www.powleygibson.com

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Powley & Gibson, P.C., 304 Hudson Street, 2nd Floor, New York, New York 10013.

-----Original Message-----

From: David J. Lorenz
Sent: Thursday, October 25, 2007 4:30 PM
To: aopp@yeellp.com
Cc: Robert L. Powley; James M. Gibson
Subject: Anna Sui v. Forever 21 -- ORN. 329.1

Dear Amy,

In response to your October 25, 2007 letter, we note that, with no admission of liability or waiver of any of our clients' rights and solely for the purposes of promoting settlement in this litigation, Forever 21 issued instructions to recall the item identified in your September 19, 2007 letter and remove the item from Forever 21's website at the beginning of this month.

Regarding the Forever 21 items discussed in your October 5, 2007 letter, we will advise you as to the status of those items shortly.

Finally, our client has been unable to identify the items cited in Exhibits 11B (top, skirt, green top, blue dress and red dress), 12B (tank top), 15B (black spaghetti strap top), 18B (black spaghetti strap top), 20B (long sleeve top), 21, 23A and 24A to the Amended Complaint solely from the photographs in the Exhibits. As such, Forever 21 has not been able recall those items. Accordingly, we ask again that you please provide item numbers for the items shown in those Exhibits to assist Forever 21 in

12/4/2007

identifying the items. We note that the list of recalled items previously provided to you by Emily Li does not include the items shown in the above Exhibits.

If you have any questions, please let us know.

Sincerely,
Dave Lorenz

POWLEY & GIBSON, p.c.
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New York, New York 10013
p (212) 226 - 5054
f (212) 226 - 5085
www.powleygibson.com

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Powley & Gibson, P.C., 304 Hudson Street, 2nd Floor, New York, New York 10013.

12/4/2007

EXHIBIT F

Parties	Court and Case No.	Type of Lawsuit
Bebe Stores, Inc. v. Forever 21	NDCal 07-00035	Copyright Infringement
LA Printex Industries v. Forever 21	CDCal 06-0333	Copyright Infringement
Samsung America, Inc. v. Forever 21	CDCal 06-06611	Copyright Infringement
Textile Secrets Intl, Inc. v. Forever 21	CDCal 07-07638	Copyright Infringement
United Fabrics, Intl, Inc. v. F21 et. al.	CDCal 07-00800	Copyright Infringement
United Fabrics, Intl, Inc. v. Forever 21 et. al	CDCal 07-01750	Copyright Infringement
United Fabrics, Intl, Inc. v. Urban Outfitters, et. al.	CDCal 07-01752	Copyright Infringement
Harajuku Lovers, LLC v. Forever 21	CDCal 07-03881	Trademark Infringement
O and K, Inc. v. Scott Hansen, et. al.	CDCal 06-05787	Copyright Infringement
Star Fabrics, Inc. v. Forever 21	CDCal 07-5220	Copyright Infringement
Star Fabrics, Inc. v. Forever 21	CDCal 07-5221	Copyright Infringement
Anthropologie v. Forever 21	SDNY 07-7873	Copyright Infringement
Textile Secrets v. Forever 21	CDCal 07-5885	Copyright Infringement
Carole Hochman Design Group v. F21	SDNY 07-7699	Copyright Infringement
Chemtex Print USA V. Forever 21	CDCAL 07- 6274	Copyright Infringement
Trovata, Inc. v. Forever 21	CDCAL 07-1196	Trademark Infringement
Miroglio s.p.a. v. Forever 21	SDNY 07-9573	Copyright Infringement
Star Fabrics, Inc. v. Forever 21	CDCAL 07-7359	Copyright Infringement
Harkham Industries, Inc. v. Forever 21 et al	CDCAL 07-7728	Copyright Infringement

EXHIBIT G



